

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**RENEE ZINSKY,**

Civil Action No. 2:22-cv-547(MJH)

Plaintiff,

The Honorable Marilyn J. Horan

v.

**MICHAEL RUSSIN, RUSSIN FINANCIAL,  
RUSSIN GROUP, SIMON ARIAS, III,  
ARIAS AGENCIES, S.A. ARIAS  
HOLDINGS, LLC, AMERICAN INCOME  
LIFE INSURANCE COMPANY,**

ELECTRONICALLY FILED

Defendants.

**DEFENDANT AMERICAN INCOME LIFE INSURANCE COMPANY’S  
MOTION TO CONFIRM ARBITRATION AWARD**

Pursuant to 9 U.S.C. § 9, Defendant American Income Life Insurance Company (“AIL”) respectfully moves the Court for an order confirming the final award in American Arbitration Association (“AAA”) Case Number 01-22-0004-0849, *Renee Zinsky vs. Arias Agencies et al., American Income Life Insurance Company* (the “Arbitration”). The Arbitration was conducted pursuant to this Court’s order compelling arbitration of all claims against defendants AIL and Simon Arias, Arias Agencies, and S.A. Holdings, LLC (Docket No. 37) and entering a stay in this case as to those defendants pending completion of arbitration, and pursuant to the demand filed by Plaintiff Renee Zinsky with AAA on September 27, 2022 and Amended Demand filed on November 18, 2022. *See* Declaration of Jeffrey M. Hammer ¶¶ 2-4. A final award was issued in the Arbitration on March 4, 2024 (“Arbitration Award”) dismissing all claims brought by Renee Zinsky with prejudice. *Id.* ¶ 5, Ex. A. Accordingly, AIL respectfully requests the Court enter an order confirming the Arbitration Award and dismissing all claims against AIL with prejudice.

AIL has not conferred with Zinsky's counsel regarding this motion, as regardless of Plaintiff's position, AIL would need to seek to confirm the award, and therefore such conferral would serve neither to preserve the parties' resources nor the Court's resources.

In support of this Motion, AIL refers the Court to the Declaration of Jeffrey M. Hammer sworn to on March 13, 2024, Exhibit A thereto (the Arbitration Award), and to the Memorandum of Law in Support of the Motion, and Proposed Order, filed herewith.

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WHEREFORE, AIL respectfully requests that the Court issue an Order:

- a. Confirming the Arbitration Award;
- b. Dismissing all claims against AIL with prejudice; and
- c. Affording AIL any other relief that the Court deems just and proper.

Dated: March 13, 2024

Respectfully submitted,

By: /s/ Andrea Kirshenbaum

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 13, 2024 a true and correct copy of the foregoing document was served and filed using the Western District of Pennsylvania's ECF system, through which this document is available for viewing and downloading, causing a notice of electronic filing to be served upon the following counsel of record:

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